

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AUTHORS GUILD, DAVID BALDACCI,
BELFRY HOLDINGS, INC., MARY BLY,
COLUMBUS ROSE, LTD., MICHAEL
CONNELLY, SYLVIA
DAY, ELOISA JAMES, INC., JONATHAN
FRANZEN, JOHN
GRISHAM, HIERONYMUS, INC., ELIN
HILDERBRAND,
CHRISTINA BAKER KLINE, S.C.R.I.B.E.,
INC., SPLENDIDE MENDAX, INC, SYLVIA
DAY LLC, VICTOR LAVALLE,
GEORGE R.R. MARTIN, JODI PICOULT,
DOUGLAS PRESTON, ROXANA ROBINSON,
GEORGE SAUNDERS, SCOTT TUROW, and
RACHEL VAIL, individually and on behalf of
others similarly situated,

Plaintiffs,

v.

OPEN AI INC., OPENAI OPCO LLC, OPENAI
GP LLC, OPENAI, LLC, OPENAI GLOBAL
LLC, OAI CORPORATION LLC, OPENAI
HOLDINGS LLC, OPENAI STARTUP FUND I
LP, OPENAI STARTUP FUND GP I LLC,
OPENAI STARTUP FUND MANAGEMENT
LLC, and MICROSOFT CORPORATION,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR
BRANCH, RICH COHEN, EUGENE LINDEN,
DANIEL OKRENT, JULIAN SANCTON,
HAMPTON SIDES, STACY SCHIFF, JAMES
SHAPIRO, JIA TOLENTINO, TOUGH JEWS,
INC., and SIMON
WINCHESTER, on behalf of themselves and all
others similarly situated,

Plaintiffs,

ECF CASE

No. 1:23-cv-08292-SHS;
No. 1:23-cv-10211-SHS

JURY TRIAL DEMANDED

v.

OPEN AI INC., OPENAI OPCO LLC, OPENAI GP LLC, OPENAI, LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, OPENAI STARTUP FUND MANAGEMENT LLC, and MICROSOFT CORPORATION,

Defendants.

AUTHOR PLAINTIFFS' MOTION TO SEAL

Under paragraph 25 of the Stipulated Protective Order in this case (Dkt. 338), Author Plaintiffs respectfully seek to provisionally file under seal portions of their letter motion to compel. The letter motion seeks a conference to discuss a discovery dispute—specifically, OpenAI's various assertions of privilege in its redacted documents and privilege log entries. The Author Plaintiffs seek to file portions of this letter motion and the exhibits under seal because both discuss documents that OpenAI has designated as Protected Discovery Material under the Protective Order. Dkt. 338 ¶ 25. The Author Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, OpenAI has five business days to file a statement of reasons why the material should be sealed. *Id.* The Author Plaintiffs will review OpenAI's filings, and if necessary, confer about any disagreement.

Dated: March 31, 2025

/s/ Rachel Geman

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Interim Class Counsel

CERTIFICATE OF SERVICE

I hereby certify this 31st day of March 2025, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the court using the CM/ECF system which will send notification to the attorneys of record and is available for viewing and downloading.

/s/ Amber B. Magee

Amber B. Magee